

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA ) Criminal No. 23cr10039  
v. ) Violation:  
JOHN SULLIVAN, ) Count One: Hate Crime Acts  
Defendant ) (18 U.S.C. § 249(a)(1))

## INDICTMENT

COUNT ONE  
Hate Crime Acts  
(18 U.S.C. § 249(a)(1))

The Grand Jury charges:

On or about December 2, 2022, in Quincy, in the District of Massachusetts, the defendant,

JOHN SULLIVAN,

willfully caused bodily injury to G.N., and attempted to cause bodily injury to G.N. through the use of a dangerous weapon, to wit, a vehicle, because of G.N.'s actual and perceived race and national origin.

All in violation of Title 18, United States Code, Section 249(a)(1).

A TRUE BILL.

## FOREPERSON



TOREY B. CUMMINGS  
ASSISTANT U.S. ATTORNEY  
DISTRICT OF MASSACHUSETTS

TARA ALLISON  
TRIAL ATTORNEY  
CIVIL RIGHTS DIVISION

District of Massachusetts: February 15, 2023  
Returned into the District Court by the Grand Jurors and filed.

/s/ Noreen A. Russo

DEPUTY CLERK at 2:29 PM